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CARLA A. McCAULEY (State Bar No. 223910
      carlamccauley@dwt.com
    DAVIS WRIGHT TREMAINE LLP
    865 South Figueroa Street, 24th Floor
    Los Angeles, California 90017-2566
3
    Tel.: (213) 633-6800 Fax: (213) 633-6899
4
    ROBERT D. BALIN (pro hac vice)
      robbalin@dwt.com
5
    LACY H. KOONCE, III (pro hac vice)
      lancekoonce@dwt.com
6
    SAMUEL BAYARD (pro hac vice)
      samuelbayard@dwt.com
7
    GEORGE WUKOSON (pro hac vice)
      georgewukoson@dwt.com
8
    DAVIS WRIGHT TREMAINE LLP
    1633 Broadway
9
    New York, New York 10019
Tel.: (212) 489-8230 Fax: (212) 489-8340
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    ATTORNEYS FOR PLAINTIFFS
11
                       UNITED STATES DISTRICT COURT
                     CENTRAL DISTRICT OF CALIFORNIA
12
    CHINA CENTRAL TELEVISION, a China
                                            ) Case No.
13
   company; CHINA INTERNATIONAL COMMUNICATIONS CO., LTD., a China company; TVB HOLDINGS (USA), INC., a
                                             CV 15-1869 MMM (AJWx)
14
                                             STIPULATION FOR ENTRY OF
    California corporation; and DISH
                                             [PROPOSED] CONSENT
15
                                             JUDGMENT AND PERMANENT
    NETWORK L.L.C., a Colorado corporation,
                                             INJUNCTION
16
                       Plaintiffs.
17
    CREATE NEW TECHNOLOGY (HK)
                                             [Proposed Consent Judgment and
    LIMITED, a Hong Kong company; HÚA
18
    YANG INTERNĂTIOŇAL TECHNOLOGY
                                             Permanent Injunction concurrently
    LIMITED, a Hong Kong company;
                                             submitted]
19
    SHENZHÉN GREATVISION NÉTWORK
    TECHNOLOGY CO. LTD., a China
20
    company; CLUB TVPAD, INC., a California
                                             Courtroom: 780
    corporation; BENNETT WONG, an
                                             Judge: Hon. Margaret M. Morrow
21
    individual, ÁSHA MEDIA GROUP INC.
    d/b/a TVPAD.COM, a Florida corporation;
22
    AMIT BHALLA, an individual;
                                             Action Filed: March 13, 2015
    NEWTVPAD LŤD. COMPANÝ d/b/a
23
    NEWTVPAD.COM a/k/a TVPAD USA, a
    Texas corporation; LIANGZHONG ZHOU,
24
    an individual; HONGHUI CHEN d/b/a E-
    DIGITAL, an individual; JOHN DOE 1 d/b/a
25
    BETV: JOHN DOE 2 d/b/a YUE HAI: JOHN
    DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;
26
    JOHN DOE 5 d/b/a GANG YUE; JOHN
    DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7
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    d/b/a GANG TAI WU XIA; and JOHN DOES
    8-10,
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                       Defendants.
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This Stipulation is entered by and between Plaintiffs China Central Television, China International Communications Co., Ltd., TVB Holdings (USA), Inc. and DISH Network L.L.C. (collectively, "Plaintiffs") and Defendants newTVpad Ltd. Company d/b/a newtvpad.com a/k/a TVpad USA and Liangzhong Zhou (collectively, the "newTVpad Defendants"), through their respective counsel of record, with reference to the following facts:

- 1. Plaintiffs filed the Complaint in this action on March 13, 2015, against, among others, the newTVpad Defendants, with claims including: (1) secondary copyright infringement under the copyright laws of the United States, 17 U.S.C. § 101 *et seq.*; (2) federal trademark infringement and unfair competition under the Lanham Act, 15 U.S.C. § 1125(a); (3) common law trademark infringement and unfair competition; and (4) violation of California Business and Professions Code § 17200, *et seq.*
- 2. Plaintiffs and the newTVpad Defendants have agreed to resolve their dispute, and have entered into a Settlement Agreement wherein the newTVpad Defendants have agreed to entry of a consent judgment and permanent injunctive relief in favor of Plaintiffs and in accordance with other terms as set forth in the Settlement Agreement.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED that:

- A true and correct copy of the Consent Judgment and Permanent
 Injunction agreed to by the parties pursuant to this Stipulation and the parties'
 Settlement Agreement (the "Consent Judgment") is attached hereto as Exhibit 1;
- 2. The parties agree that all facts set forth in the Consent Judgment are true and accurate to their best knowledge and support entry of the Consent Judgment;
- 3. The newTVpad Defendants agree to be bound by and abide by all permanent injunctive relief set forth in the Consent Judgment entered by the Court;
- 4. The parties hereby enter into this Stipulation with the advice of counsel knowing its content and effect;

form attached as Exhibit 1; and	
6. The parties request the Court retain jurisdiction to enforce the Consent	
Judgment, once entered, as required.	
So Stipulated.	
DATED: June 18, 2015	DAVIS WRIGHT TREMAINE LLP
	CARLA A. McCAULEY ROBERT D. BALIN (pro hac vice)
	ROBERT D. BALIN (pro hac vice) LACY H. KOONCE, III (pro hac vice) SAMUEL BAYARD (pro hac vice) GEORGE WUKOSON (pro hac vice)
	By: /s Carla A. McCauley Carla A. McCauley
	Attorneys for Plaintiffs
	Attorneys for Plaintiffs CHINA CENTRAL TELEVISION; CHINA INTERNATIONAL COMMUNICATIONS CO., LTD.; TELEVISION BROADCASTS LIMITED; TVB HOLDINGS (USA), INC.; AND DISH
	TVB HOLDINGS (USA), INC.; AND DISH NETWORK L.L.C.
	NET WORK L.L.C.
DATED: May 18, 2015	NI, WANG & MASSAND, PLLC
	By:
	Timothy Wang
	Attorneys for Defendants NEWTTVPAD LTD. COMPANY; AND
	LIANGZHONG ZHOU
	6. The parties red Judgment, once entered, as So Stipulated. DATED: June 18, 2015

1	5. The Parties request	that the Court enter the Consent Judgment in the	
2	form attached as Exhibit 1; and		
3	6. The parties request	the Court retain jurisdiction to enforce the Consent	
4	Judgment, once entered, as required.		
5	So Stipulated.		
6	DATED: June, 2015	DAVIS WRIGHT TREMAINE LLP CARLA A. McCAULEY	
7		ROBERT D. BALIN (pro hac vice)	
8	form attack of a	ROBERT D. BALIN (pro hac vice) LACY H. KOONCE, III (pro hac vice) SAMUEL BAYARD (pro hac vice) GEORGE WUKOSON (pro hac vice)	
9	6.	GEORGE WOROSON (pro nac vice)	
10	ludjeneri, e s	By: /s Carla A. McCauley Carla A. McCauley	
11	Sorri	Attamany for Plaintiffs	
12	DATED: Auto-	CHINA CENTRAL TELEVISION; CHINA INTERNATIONAL COMMUNICATIONS CO.,	
13		CHINA CENTRAL TELEVISION; CHINA INTERNATIONAL COMMUNICATIONS CO., LTD.; TELEVISION BROADCASTS LIMITED; TVB HOLDINGS (USA), INC.; AND DISH NETWORK L.L.C.	
14	Was approved to	NETWORK L.L.C.	
15	DATED: June 15, 2015	NI, WANG & MASSAND, PLLC	
16	and the service of the service of		
17	No. 2		
18	DATIND	By:Timothy Wang	
19		Attorneys for Defendants NEWTTVPAD LTD. COMPANY; AND LIANGZHONG ZHOU	
20		LIANGZHONG ZHOU	
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25	District		
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